Exhibit E







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Porn star says his career was destroyed by false claims he nearly killed a dog with meth

Exclusive: Adult performer Owen Hawk told *The Independent* his income has since dropped from more than \$500,000 to just over \$10,000

Justin Rohrlich in New York • Wednesday 05 February 2025 09:59 EST





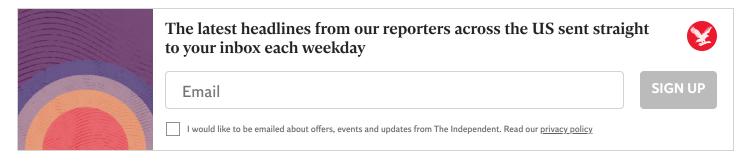








Robert Felt, aka Owen Hawk, says his career has gone off the rails thanks to defamatory statements circulated throughout the industry (owenhawknyc/Instagram)



A prominent gay porn star is accusing a pair of former business partners of sullying his reputation by posting "extreme" false claims about him on social media, including that he nearly killed a dog by feeding it meth.

In a bombshell lawsuit filed last Friday, Robert Felt, who is known professionally as Owen Hawk, says the claim — along with allegations that he is a "sex offender," "engaged in domestic violence," and "committ[ed] fraud and other crimes — is not only false, but has also largely put the brakes on his 20-plus-year career.

Felt's complaint names Damian Todaro, the owner of PPVNetwork, a hardcore streaming service, and Todaro's boyfriend, identified in court papers only as "Elvis," as the perpetrators of an "extreme and outrageous" defamation campaign against him following a work dispute last year. As a result, Felt's professional opportunities have dwindled to the point that he has "been forced to liquidate his retirement funds to survive and defend himself," according to the complaint.

On Tuesday, Felt told *The Independent* that in 2024, his business took in "well over \$500,000," but that has now dropped to less than \$1,000 a month and he feels uncertain about being able to renew his lease, which is about to end. He said he has spent years building a brand, and that it has been excruciating to see it stripped away.

"It's been really painful," Felt said. "It's a lot of loss to process. I haven't been able to draw a salary in five months, I've fallen behind on my rent... It just seems unbelievably unfair that I should have to be in this situation, while people who I considered to be friends get to go on with all the value I created [for the company] for themselves. In what world is that possibly fair?"

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He contended he was "used" to build a successful venture, then "dumped when I determined I was no longer useful, despite contractual arrangements."

"These guys are living in a multi-million dollar home on Fire Island, trying to squeeze me out of my share, robbing me of the value of [my] life's work," Felt said.



Robert Felt, known professionally as Owen Hawk, says he is now living off of his retirement savings (Courtesy Robert Felt)

Attorney Wesley Mullen, who is representing Todaro and Elvis, declined to comment on the case.

In 2005, Felt, who also directs, founded Dark Alley Media, a production and distribution company that "has since become a recognized leader in the adult content industry, with a library of over 300 titles and numerous awards," his complaint states. It describes Owen Hawk, Felt's alter ego, as "a public figure" who has "built a reputation for professionalism and excellence in the industry," and boasts more than 250,000 followers on X, the social network formerly known as Twitter.

the complaint explains.

But, in April 2024, the relationship between Dark Alley and PPVNetwork began to deteriorate, intensifying through summer and fall, and finally fell apart altogether last November, the complaint continues. That's when, it alleges, Todaro and Elvis launched a scheme to ruin him.

- 28. On information and belief, Elvis, using various social media accounts, made false and defamatory statements about Hawk, including but not limited to:
 - a. Accusing Hawk of being a sex offender;
 - Accusing Hawk of committing fraud and other crimes;
 - c. Claiming Hawk engaged in domestic violence and attempted to kill a dog.



Robert Felt is accusing a pair of former business partners of defaming him with false claims that, among other things, he tried to kill a dog (NYS Supreme Court)

On X, according to the complaint, an account with the handle "@rawf**kclub," a trademarked name previously used by the Dark Alley-PPVNetwork joint venture, posted, "Make sure @owenhawk is sober on set... He has a parole officer to report too [sic]."

Someone then began submitting bogus takedown notices to the Adult Entertainment Broadcast Network (AEBN), a video-on-demand provider with which Felt had a lucrative exclusive contract, under the Digital Millennium Copyright Act, the complaint states. It says the DMCA notice claimed that a video uploaded by "Owen Hawk" included "non-consensual sex," as well as "underage... non-consensual behavior," and branded him a "felon," before going on to threaten AEBN's credit card processor.

Additionally, the complaint says a YouTuber going by "@musclef*k1225" posted a comment that read: "Owen Hawk committed illegal activities and was terminated. He is not being Honest!... he is a DRUG ADDICT and nearly killed someones [sic] dog by dropping a METH baggie on the floor... Owen Hawk tried killing my dog with METH."

Felt claims he was also accused of being a domestic abuser, a sex predator, and a con artist, according to the complaint.



Robert Felt says in his complaint that he geolocated some of the messages in question back to an area near where his ex-business partners live (Courtesy Robert Felt)

Felt's complaint accuses Elvis of spreading the false claims, under Todaro's supervision, and roping in others to post false allegations about Hawk and submit their own phony takedown notices. At least one of the DMCA notices was allegedly submitted from an IP address that Felt's complaint claims was geolocated to Bayshore, New York, a Long Island hamlet across the bay from Fire Island, where Todaro and Elvis have a home.

In December 2024, according to the complaint, Felt was dropped by AEBN, "citing these false claims and threats to its credit card processor," striking at the heart of

Ealt's numary in some stream

reputational damage, and interference with its ability to monetize its content," the

"As a result of Defendant's actions, [Dark Alley Media] has suffered financial losses,

complaint states.

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Felt is now asking a judge to award him attorneys' fees, compensatory damages and punitive damages in an amount to be determined at trial, and a court order barring Todaro and Elvis from defaming him in the future.

Todaro and Elvis now have roughly three weeks to file a formal response to Felt's claims.

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